IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

RYAN BAUGH,

Plaintiff,

v.

Case No. 2:24-CV-10036

CENTRAL INTELLIGENCE AGENCY,

Defendant.

Hon. Susan K. DeClercq

DEFENDANT'S UNOPPOSED MOTION TO EXTEND THE TIME TO FILE OPPOSITIONS TO MOTION TO STRIKE AND MOTION FOR JURISDICTIONAL DISCOVERY

Defendant Central Intelligence Agency moves to extend the time to file its oppositions to Plaintiff's Motion to Strike Redacted Exhibit and Compel Filing of Unredacted Exhibit (ECF No. 17) and Plaintiff's Motion for Jurisdictional Discovery (ECF No. 19). Pursuant to Local Rule 7.1(a), on May 20, 2024, the undersigned counsel consulted with Plaintiff's counsel, and he had no objection, provided that Defendant would not oppose a further extension of the deadline for his opposition to Defendant's motion to dismiss—a condition to which Defendant agreed. As explained below, Defendant has good cause for this extension.

- Under the local rules, Defendant's opposition to Plaintiff's Motion to Strike would be due on May 31, 2024, and Defendant's opposition to Plaintiff's Motion for Jurisdictional Discovery would be due on June 3, 2024.
- A brief extension is needed because the undersigned counsel for Defendant has a previously scheduled vacation from May 22, 2024 through May 29, 2024. In addition, she has deadlines in other cases on June 3, 2024.
- 3. For these reasons, Defendant respectfully requests an extension to June 7, 2024, to respond to Plaintiff's two motions.

Respectfully submitted,

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